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VIA ECF

August 4, 2022

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

**Re: *Iowa Pub. Emps.' Ret. Sys. et al. v Bank of Am. Corp. et al.*,
No. 1:17-cv-06221-KPF-SLC (S.D.N.Y.)**

Dear Judge Failla:

We write on behalf of Defendants regarding page limits for Defendants' forthcoming objections to Magistrate Judge Cave's Report and Recommendation (Dkt. 563), which are due on August 15, 2022. Defendants respectfully request permission to file a 50-page opening brief. Plaintiffs do not consent to this request.

Defendants respectfully submit that this request is justified based on the "complexity of the issues presented" (Order, Dkt. 566) in the 71-page Report and Recommendation, which itself addresses over 150 pages of briefing and thousands of pages of associated expert reports relating to class certification in this case. Defendants plan to file a single consolidated brief on behalf of all six sets of remaining Defendants in this action—the same number of pages that this Court previously allowed for consolidated briefs addressing the motion to dismiss and Plaintiffs' motion for class certification. Likewise here, 50 pages are necessary to appropriately address and respond to the myriad findings of Magistrate Judge Cave upon which this recommendation is based, which we will endeavor to do as concisely as possible. Plaintiffs will not be prejudiced by allowing Defendants leave to file a 50-page brief, as Defendants do not object to Plaintiffs receiving leave to file a 50-page response to Defendants' objections.

Accordingly, Defendants respectfully request that the Court grant their request for leave to file a 50-page brief objecting to the Request and Recommendation.

WINSTON
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Respectfully submitted,

/s/ Staci Yablon

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cc: Counsel for All Parties (via ECF)